**Exhibit A**

**Proposed Order**

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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| In re:<br><br>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,<br><br>    as representative of<br><br>THE COMMONWEALTH OF PUERTO RICO, *et al.*,<br><br>                 Debtors.[1] | PROMESA<br>Title III<br><br>No. 17 BK 3283-LTS<br><br>(Jointly Administered)<br><br>**This filing relates to the Commonwealth and ERS.** |

ORDER GRANTING TWO HUNDRED SIXTY-THIRD OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO DEFICIENT CLAIMS WITH RESPECT TO WHICH DEFICIENT MAILING RESPONSES WERE RECEIVED

Upon the *Two Hundred Sixty-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and Employee Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims with Respect to which Deficient Mailing Responses Were Received* [ECF No. 14910] (the "Two Hundred Sixty-Third Omnibus

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[1] The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Objection"),[2] filed by the Commonwealth of Puerto Rico ("Commonwealth") and the Employees

Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS"), dated

October 23, 2020, for entry of an order disallowing in their entirety certain claims filed against the

Commonwealth or ERS, as more fully set forth in the Two Hundred Sixty-Third Omnibus

Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Two

Hundred Sixty-Third Omnibus Objection and to grant the relief requested therein pursuant to

PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and

due and proper notice of the Two Hundred Sixty-Third Omnibus Objection having been provided

to those parties identified therein, and no other or further notice being required; and each of the

claims identified in Exhibit A to the Two Hundred Sixty-Third Omnibus Objection (collectively,

the "Deficient Claims") having been found to be deficient; and the Court having determined that

the relief sought in the Two Hundred Sixty-Third Omnibus Objection is in the best interests of the

Commonwealth, ERS, their creditors, and all parties in interest; and the Court having determined

that the legal and factual bases set forth in the Two Hundred Sixty-Third Omnibus Objection

establish just cause for the relief granted herein; and the Court having deemed a hearing is not

necessary as no objection, responsive pleading, or request for a hearing with respect to the Two

Hundred Sixty-Third Omnibus Objection has been submitted, and after due deliberation and

sufficient cause appearing therefor, it is hereby

ORDERED that the Two Hundred Sixty-Third Omnibus Objection is GRANTED

as set forth herein; and it is further

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[2]    Capitalized terms not otherwise defined herein shall have the meanings given to such
terms in the Two Hundred Sixty-Third Omnibus Objection.

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ORDERED that the Deficient Claims are hereby disallowed in their entirety; and it is further

ORDERED that Prime Clerk, LLC, is authorized and directed to designate the Deficient Claims as expunged in the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 14910 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

_____
Honorable Judge Laura Taylor Swain
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Two Hundred Sixty-Third Omnibus Objection**

## Two Hundred and Sixty-Third Omnibus Objection
### Exhibit A - Schedule of  Deficient Claims to be Disallowed via Notice of Presentment

| | NAME | DATE FILED | CASE NUMBER | DEBTOR | CLAIM # | ASSERTED CLAIM AMOUNT |
|---|---|---|---|---|---|---|
| 1 | HERRERA SANCHEZ, NAZARIO<br>HC#5 BOX 5138<br>YABUCOA, PR 00767 | 10/7/2019 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 171691 | Undetermined* |
| | Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors | | | | | |
| 2 | LLORENS, EDGARDO SANTIAGO<br>1925 LAS AMERICAS<br>PONCE, PR 00728-1815 | 5/29/2018 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 28797 | $ 100,000.00* |
| | Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors | | | | | |
| 3 | MORALES BENITEZ, NEREIDA<br>462 C/ JOSEFA MENDIA<br>URB. LOS MAESTROS<br>SAN JUAN, PR 00923 | 5/25/2018 | 17 BK 03566-LTS | Employees Retirement System of the Government of the Commonwealth of Puerto Rico | 27629 | $ 1,300.00* |
| | Reason: Proof of claim purports to assert liabilities associated with the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Employees Retirement System of the Government of the Commonwealth of Puerto Rico or any of the other Title III debtors | | | | | |
| 4 | ORTIZ RIVERA, NORMA JUDITH<br>PARQUE DEL RIO<br>PE 12 VIA DEL RIO<br>TRUJILLO ALTO, PR 00976 | 6/5/2018 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 35606 | $ 997.00 |
| | Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors | | | | | |
| 5 | RAMOS PUENTE, GENEROSA M.<br>HC-01 BOX 4020<br>ADJUNTAS, PR 00601 | 10/3/2019 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 171098 | Undetermined* |
| | Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors | | | | | |
| | | | | | TOTAL | $ 102,297.00* |

* Indicates claim contains unliquidated and/or undetermined amounts